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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 **IN RE GOOGLE PLAY STORE**
5 **ANTITRUST LITIGATION**

Case No. 3:21-md-02981-JD

6 THIS DOCUMENT RELATES TO:

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED PURSUANT TO
CIVIL LOCAL RULE 79-5**

7 *Epic Games, Inc. v. Google LLC et al.*,
8 Case No. 3:20-cv-05671-JD

9 *In re Google Play Consumer Antitrust
Litigation*, Case No. 3:20-cv-05761-JD

10 *State of Utah et al. v. Google LLC et al.*,
11 Case No. 3:21-cv-05227-JD

Date: January 31, 2023 at 1:30 p.m.
Courtroom: 11, 19th Floor
Judge: Hon. James Donato

12 *Match Group, LLC et al. v. Google LLC et*
13 *al.*, Case No. 3:22-cv-02746-JD

Pursuant to Civil Local Rules 7-11 and 79-5(f), Plaintiffs submit this administrative motion to consider whether another party's material should be sealed with respect to their Response to Google's Brief in Response to the Court's Minute Order Questions Regarding Preservation of Chat Messages ("Plaintiffs' Response"), and Exhibits 6-10 to the Declaration of Michael J. Zaken ("Zaken Declaration"). The documents and portions of documents Plaintiffs seek to temporarily file under seal are listed below:

Document	Corresponding Page and Line Number(s)
Plaintiffs' Response	Page 9, lines 17-19, between "among other things," and "(GOOG-PLAY3-000012530)."
Plaintiffs' Response	Page 9, footnote 7, between "Jim Kolotouros testified that" and "(Zaken Decl.)"
Plaintiffs' Response	Page 12, line 7, between "whether" and "was going"
Plaintiffs' Response	Page 12, lines 8-9, between "long made efforts to" and "(Zaken Decl.)"
Plaintiffs' Response	Page 12, line 9, between "likely that these" and "discussions contained"
Plaintiffs' Response	Page 12, line 10, between "competitors like" and "Ms. Kochikar"
Plaintiffs' Response	Page 12, lines 11-13, between "on, emailed" and "(Zaken Decl.)"
Plaintiffs' Response	Page 12, line 14-15, between "As another example" and "(Zaken Decl.)"
Zaken Decl. Ex. 6	Document in its entirety.
Zaken Decl. Ex. 7	Document in its entirety.
Zaken Decl. Ex. 8	Document in its entirety.
Zaken Decl. Ex. 9	Document in its entirety.
Zaken Decl. Ex. 10	Document in its entirety.
Zaken Decl. Ex. 11	Document in its entirety.

Plaintiffs oppose the sealing of any portions of these documents but seek leave to provisionally file the documents under seal because they discuss materials that Google has designated confidential or highly confidential under the protective order in this case. *See* Local Rule 79-5(f). Plaintiffs intend to oppose, under Rule 79-5(f)(4), any submission Google makes to support sealing under Rule 79-5(f)(3).

1 Plaintiffs also hereby provide notice of lodging to all parties and their counsel pursuant to
2 Civil Local Rule 79-5(f).

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4 Dated: January 27, 2023

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6
7 BARTLIT BECK LLP
8 Karma M. Giulianelli

9 KAPLAN FOX & KILSHEIMER LLP
10 Hae Sung Nam

11 Respectfully submitted,

12 By: /s/ Karma M. Giulianelli
13 Karma M. Giulianelli

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E-FILING ATTESTATION

I, Lauren A. Moskowitz, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(h)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Lauren A. Moskowitz
Lauren A. Moskowitz